

**MORRISON FOERSTER**

250 WEST 55TH STREET  
NEW YORK  
NEW YORK 10019-9601  
  
TELEPHONE: 212.468.8000  
FACSIMILE: 212.468.7900  
  
WWW.MOFO.COM

MORRISON & FOERSTER LLP  
AUSTIN, BEIJING, BERLIN, BOSTON,  
BRUSSELS, DENVER, HONG KONG,  
LONDON, LOS ANGELES, MIAMI,  
NEW YORK, PALO ALTO, SAN DIEGO,  
SAN FRANCISCO, SHANGHAI, SINGAPORE,  
TOKYO, WASHINGTON, D.C.

December 22, 2023

Writer's Direct Contact  
+1 (212) 468-8203  
JLevitt@mofo.com

**VIA ECF**

Hon. Naomi Reice Buchwald  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Tech+IP Advisory, LLC v. BlackBerry Limited*, No. 1:23-cv-05996-NRB  
Letter Motion to Seal Reply

Dear Judge Buchwald:

On behalf of Defendant BlackBerry Limited ("BlackBerry"), we write to seek the Court's permission pursuant to Section 2.H of Your Honor's Individual Practices to file portions of BlackBerry's Reply Memorandum of Law in Support of its Motion to Dismiss ("Reply") in redacted form.

On August 4, 2023, this Court granted the parties' request to redact portions of the Complaint and file Exhibits A and B to the Complaint under seal (the "Sealing Order"). (ECF No. 12.) Plaintiff Tech+IP Advisory, LLC ("Tech+IP") subsequently filed an Amended Complaint on October 24, 2023 (ECF No. 23). The Amended Complaint also contained redactions and the exhibits were filed under seal pursuant to the Sealing Order. BlackBerry cites to redacted portions of the Amended Complaint and its sealed exhibits in the Reply.

The Reply contains information that (i) may be subject to a non-disclosure agreement between Tech+IP and BlackBerry dated April 1, 2020; (ii) descriptions of the terms on which third-parties were willing to purchase BlackBerry's patent assets; and (iii) references to the terms, including price terms, pursuant to which Tech+IP was willing to provide services to BlackBerry.

Accordingly, BlackBerry requests the Court's permission to seal the unredacted version of the Reply with the viewing level "Selected Parties." Consistent with the ECF Rules, a redacted version of the Reply will be filed on the public docket.

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Respectfully,

*/s/ Jamie A. Levitt*

Jamie A. Levitt

cc: All counsel of record (by ECF)

Application granted.

**SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: December 26, 2023  
New York, New York